

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF ARKANSAS
FORT SMITH DIVISION**

**IN RE: CYNTHIA FLURRY,
ROBERT FLURRY
DEBTOR**

**Case No.: 2:20-bk-71511
Chapter 13**

**MOTION TO EXTEND
THE AUTOMATIC STAY**

Comes now the debtor, Cynthia Flurry (herein referred to as the “Debtor) by and through their attorney, Joel G. Hargis of Caddell Reynolds Law Firm, and for her Motion to Extend the Automatic Stay, state as follows:

1. Debtor filed for relief under Chapter 13 of the Bankruptcy Code on June 30, 2020, in a joint filing with her husband, Robert Flurry.
2. Debtor was dismissed from a previous Chapter 13 case, bearing the case number 2:18-bk-72040 on July 13, 2019, for failure to make full and timely payments.

This prior case was an individual case with Mrs. Flurry listed as the only debtor.
3. Debtor has filed the above-styled case in good faith and with the belief that the Chapter 13 Plan will be able to successfully complete.
4. Debtor requests that the Court extend the automatic stay pursuant to 11 U.S.C. § 362(c)(3)(B) as to all creditors listed in order to allow debtor an opportunity to effectively reorganize.
5. Debtor requests that in the event that any responses are filed to this Motion that the Court enter an order extending the stay until a time the Court can hear the matter and make a ruling.

WHEREFORE, Debtor prays that the Court grant the Motion to Extend the Automatic Stay and for all other just and proper relief to which the debtor is entitled.

Respectfully,

Caddell Reynolds Law Firm
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Fort Smith, AR 72902
479-782-5297
jhargis@justicetoday.com

/s/Joel G. Hargis
Joel G. Hargis 2004007

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**NOTICE OF OPPORTUNITY TO OBJECT
TO MOTION TO EXTEND THE AUTOMATIC STAY**

You are hereby notified that the captioned debtor has filed the attached Motion to Extend the Automatic Stay and this Notice of Opportunity to Object, pursuant to Rule 2002 of the Rules of Bankruptcy Procedure. Objections or responses to the attached Motion must be filed with the Bankruptcy Court at 300 W. 2nd St., Little Rock, AR 72201, in writing within 14 days from the date of this notice with copies to the attorney for the debtors and to Joyce Bradley Babin, PO Box 8064, Little Rock, AR 72203.

If objections or responses to the Motion are filed, they will be set for hearing by subsequent notice. If no objections are received, the Motion may be granted without further notice or hearing.

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/s/Joel G. Hargis
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I caused copies of the forgoing document was served on the below interested parties in the manner described above by each on this 2nd day of July 2020., , by ECF, and to all creditors found on the matrix, by first class U.S. mail, postage pre-paid, by and through the third-party authorized bankruptcy notice provider, BK Attorney Services, Inc.

Joyce Bradley Babin – **via CM/ECF**
Chapter 13 Trustee

Patricia J. Stanley – **via CM/ECF**
Asst. United States Trustee

All creditors per the Matrix – **via Regular Mail**

/s/Joel G. Hargis
Joel G. Hargis